

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DISTRICT)**

HAGERSTOWN RECOVERY LLC  
DBA THE VALLEY  
19120 MUNCASTER RD.  
DERWOOD, MD 20855,

Plaintiff,

v.

NEW SPIRIT RECOVERY LLC C/O  
ARTHUR KAZANCHIAN  
17856 CATHEDRAL PL  
ENCINO, CA 91316,

&

TREATMENT OUTREACH SERVICES  
INC. C/O JESSICA PHELAN  
1163 FERNLEA DR WEST PALM BEACH,  
FL 33417

&

JESSICA PHELAN-personally 1163  
FERNLEA DR WEST PALM BEACH, FL  
33417

&

POLARIS DETOX LLC DBA  
INNOVO DETOX  
7007 YORK RD.  
ABBOTTSTOWN, PA 17301

Defendants.

Case No.: 8:25-cv-01252-DKC  
Jury Trial Demanded

**DECLARATION OF LESHON HILL IN SUPPORT OF DEFENDANT NEW SPIRIT  
RECOVERY LLC'S MOTION TO DISMISS**

I, Leshon Hill, declare as follows:

1. I am an individual currently residing in the County of Los Angeles, State of

1 California, and am over 18 years of age. I am the Chief Executive Officer of Defendant New Spirit  
2 Recovery LLC (“NSR”). I submit this declaration in support of NSR’s Motion to Dismiss the  
3 Amended Complaint of Hagerstown Recovery LLC (“Hagerstown”).

4 2. I have personal knowledge of the facts stated herein and if called to testify upon same  
5 could and would do so willingly.

6 3. My company, NSR, is a residential addiction recovery and detox center for  
7 individuals on their journey toward healing and growth. Our goal is to provide a nurturing  
8 environment that empowers individuals to recover from drug and alcohol addiction and reclaim their  
9 lives.

10 4. NSR is based in Encino, which is a suburb in the San Fernando Valley located in Los  
11 Angeles, California. NSR is a small company and serves patients in and around Encino, where its  
12 treatment center is located. NSR is therefore a local company which operates only in Los Angeles  
13 and serves patients from around Greater Los Angeles and Southern California. For example, our  
14 website states, “New Spirit Recovery serves people throughout Los Angeles and all of California.  
15 Call us today . . . .” True and correct copies of screenshots of our website at  
16 *www.newspiritrecovery.com* are attached hereto as **Exhibit A**.

17 5. The San Fernando Valley is commonly referred to as “**The Valley**.” The Valley is  
18 featured in countless films and in popular culture, and people around the United States and the world  
19 understand “The Valley” refers to this well-known geographic location in Los Angeles. For  
20 example, a Wikipedia article for “San Fernando Valley” explains:

21 The San Fernando Valley, known locally as the Valley, is an  
22 urbanized valley in Los Angeles, California. Situated to the north of  
23 the Los Angeles Basin, it comprises a large portion of Los Angeles,  
24 the incorporated cities of Burbank, Calabasas, Glendale, Hidden Hills  
25 and San Fernando, plus several unincorporated areas. The valley is  
the home of Warner Bros. Studios, Walt Disney Studios, and the  
Universal Studios Hollywood theme park.

26 A true and correct copy of the Wikipedia article is attached hereto as **Exhibit B**.

27 6. Another news article from the Wall Street Journal entitled “Living in ‘the Valley’ Is,  
28 Like, Cool Now” explains, “[t]he majority of the San Fernando Valley lies within the city of Los

1 Angeles, but locals nonetheless tend to refer to it as ‘the Valley’ and to the rest of Los Angeles as  
2 ‘the city.’” Attached hereto as **Exhibit C** is a true and correct copy of the foregoing Wall Street  
3 Journal article.

4 7. NSR is a California limited liability company whose members are California citizens.  
5 NSR is located in California and only treats patients in California, namely, at its facility in Encino.

6 8. NSR does not have any employees, officers, directors, agents, or representatives in  
7 Maryland, and never has. In its Amended Complaint, Plaintiff Hagerstown alleges NSR has  
8 “agents” or “intake officers” in Maryland, but this is completely false – we do not have any “agents,”  
9 “intake officers,” or any other people or entities conducting activities or working for NSR in  
10 Maryland.

11 9. NSR does not own or control, and is not affiliated with “treatmentpages.com”.

12 10. NSR does not own or control, and is not affiliated with  
13 “https://treatmentadvisors.info/”.

14 11. NSR does not have any offices or any physical presence in Maryland, and does not  
15 conduct any business activities of any kind in Maryland.

16 12. NSR does not have any bank accounts, property, phone listings, or state registrations  
17 in Maryland.

18 13. Plaintiff Hagerstown has made false allegations that NSR “infringed” its claimed  
19 trademark “The Valley.” The allegations are vague, unclear, and focused on the websites  
20 “treatmentpages.com” and “https://treatmentadvisors.info/” which have nothing to do with NSR, as  
21 NSR does not own or control those websites. Hagerstown appears to be suggesting NSR purchased  
22 Google keyword advertising including the phrase “The Valley MD.” This is false. NSR has never  
23 purchased any Google keyword advertising containing the term “The Valley MD” or any other  
24 Maryland-specific words or phrases.

25 14. Hagerstown also alleges an “intake officer” “who either worked for or was an agent  
26 of [NSR]” spoke with “an agent of [Hagerstown]” in multiple telephone calls, and that the intake  
27 officer said he was in Maryland. This is false. NSR never had any of the telephone calls with the  
28 Hagerstown agent which are alleged in the Amended Complaint. NSR does not have any “intake

1 officers,” employees, agents, or personnel in Maryland. NSR has never had anyone “work[ing] for”  
2 NSR or otherwise acting as an “agent” of NSR in Maryland.

3 15. NSR has never admitted or treated any Maryland patient at its facility arising out of  
4 or relating to the purchase of any Google keyword advertising alleged in the Amended Complaint.  
5 NSR has never admitted, treated, solicited, or even spoken to any Maryland resident as a result of  
6 any alleged advertising involving “The Valley MD” or any other allegations in the Amended  
7 Complaint, which are false.

8 16. NSR has never targeted Maryland through advertising, online or otherwise.

9 17. NSR’s website at [www.newspiritrecovery.com](http://www.newspiritrecovery.com) is informational in nature and  
10 promotes NSR’s services provided in Southern California. The website is not targeted to  
11 Maryland residents. The website is nationally accessible but has no Maryland-focused content,  
12 pricing, or promotions. The contact form for potential patients directs them to a California phone  
13 number and Los Angeles address. “Maryland” is not mentioned anywhere on the website  
14 precisely because NSR does not target Maryland residents; NSR is a Los Angeles-based facility  
15 focused on treating patients locally in Greater Los Angeles and Southern California.

16 I declare under penalty of perjury under the laws of the United States that the foregoing is  
17 true and correct.

18 Executed this 17 June 2025 at Los Angeles, California

19  
20 /s/ 

21 LESHON HILL  
22 NEW SPIRIT RECOVERY LLC  
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## EXHIBIT A





Rewired Areas We Serve Tour Our Facility Call Our Addiction Specialists Today! +1 (424) 317-9319

Home About Us Treating Addiction Our Programs Therapeutic Modalities TAKE THE FIRST STEP

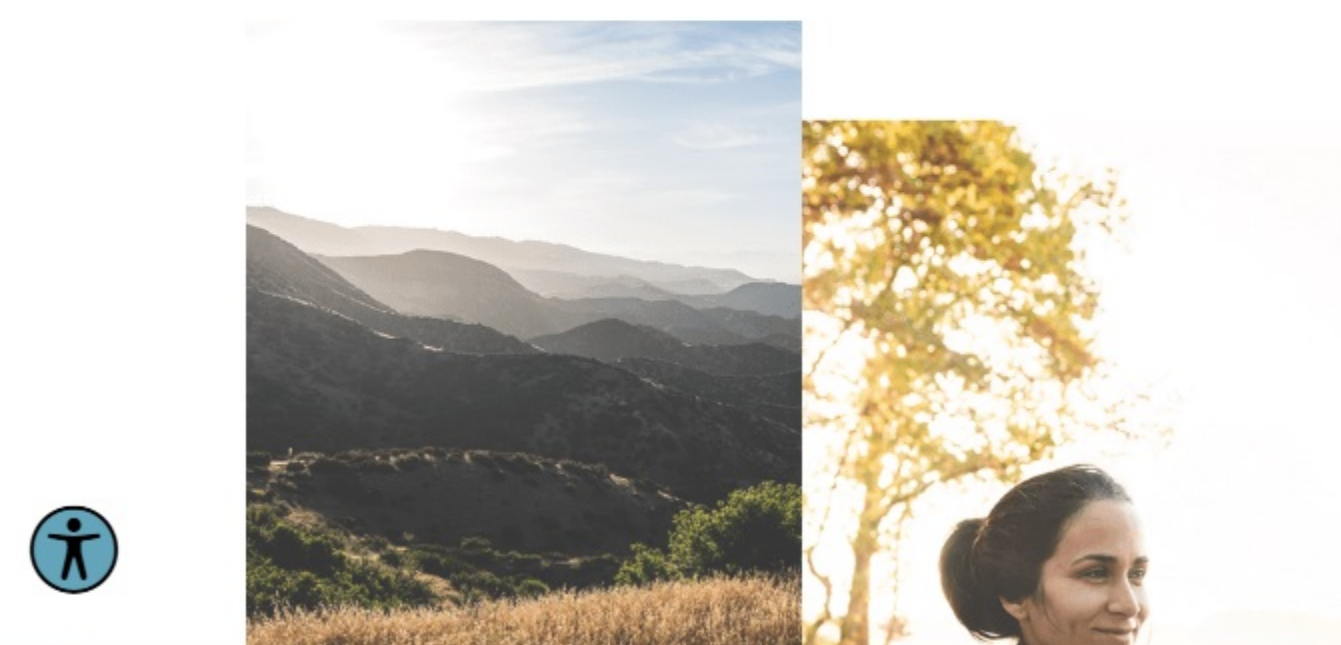
NEW SPIRIT RECOVERY  
Making Your Recovery Possible  
GET STARTED TODAY



AREAS WE SERVE  
Why People from All Over California Choose New Spirit Recovery

New Spirit Recovery should be your first choice for addiction treatment in Southern California. We use a holistic approach that “Rewires” your mind, body, and soul to grow out of the behaviors and habits that triggered your addiction in the first place. Our rehab professionals recognize that recovery is a lifelong journey, n offer a variety of treatment options that help you now and far into the future.

Connect Call Text Email







## TAKE THE FIRST STEP

New Spirit Recovery serves people throughout Los Angeles and all of California. Call us today at (424) 317-9319 to find out if our addiction treatment program is the right fit for you.

- Encino
- Tarzana
- Topanga
- Sherman Oaks
- Studio City

## Greater Los Angeles



 **Email**









## EXHIBIT B





# San Fernando Valley

The **San Fernando Valley**,<sup>[1]</sup> known locally as the **Valley**,<sup>[2][3]</sup> is an urbanized valley in Los Angeles County, California. Situated to the north of the Los Angeles Basin, it comprises a large portion of Los Angeles, the incorporated cities of Burbank, Calabasas, Glendale, Hidden Hills and San Fernando, plus several unincorporated areas.<sup>[4]</sup> The valley is the home of Warner Bros. Studios, Walt Disney Studios, and the Universal Studios Hollywood theme park.

## Geography

The valley of San Fernando is an area of 260 square miles (670 km<sup>2</sup>),<sup>[5]</sup> bounded by the San Gabriel Mountains in the northeast, the Verdugo Mountains in the east, the Santa Monica Mountains and Chalk Hills in the south, the Simi Hills in the west, and the Santa Susana Mountains in the northwest. The northern Sierra Pelona Mountains, northwestern Topatopa Mountains, southern Santa Ana Mountains, and Downtown Los Angeles skyscrapers can be seen from higher neighborhoods, passes, roads and parks in the San Fernando Valley.

The Los Angeles River begins at the confluence of Calabasas Creek (*Arroyo Calabasas*) and Bell Creek (*Escorpión Creek*), between Canoga Park High School and Owensmouth Avenue (just north of Vanowen Street) in Canoga Park. These creeks' headwaters are in the Santa Monica Calabasas foothills, the Simi Hills' Hidden Hills, Santa Susana Field Laboratory, and Santa Susana Pass Park lands. The river flows eastward along the southern regions of the Valley. One of the river's two unpaved sections can be found at the Sepulveda Basin. A seasonal river, the Tujunga Wash, drains much of the western facing San Gabriel Mountains and passes into and then through the Hansen Dam Recreation Center in Lake View Terrace. It flows south along the Verdugo Mountains through the eastern communities of the valley to join the Los Angeles River in Studio City. Other notable tributaries of the river include Dayton Creek, Caballero Creek, Bull Creek, Pacoima Wash, and Verdugo Wash. The elevation of the floor of the valley varies from about 600 ft (180 m) to 1,200 ft (370 m) above sea level.

### San Fernando Valley



The San Fernando Valley looking northeast; from the top of Topanga Overlook Park above Woodland Hills in the foreground



San Fernando Valley

**Area** 260 square miles (670 km<sup>2</sup>)

#### Naming

**Native name** *El Valle de Santa Catalina de Bononia de los Encinos* (Spanish)

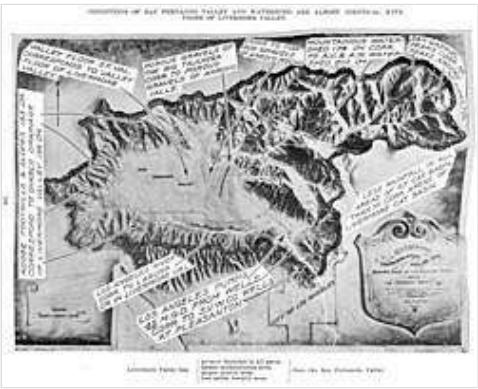
#### Geography

**Location** California

**Population centers** Los Angeles, Burbank, Glendale, Calabasas, Hidden Hills, San Fernando

**Borders on** Santa Susana Mountains (northwest), Simi Hills (west), Santa Monica Mountains and Chalk Hills (south), Verdugo Mountains (east), San Gabriel Mountains (northeast)

Most of the San Fernando Valley is within the jurisdiction of the City of Los Angeles,<sup>[3]</sup> although a few other incorporated cities are located within the valley as well: Burbank is in the southeastern corner of the valley, and San Fernando, which is completely surrounded by the city of Los Angeles, is near the northern end of the valley. Universal City, an enclave in the southern part of the valley, is an unincorporated area housing the Universal Studios filming lot and theme park. Mulholland Drive, which runs along the ridgeline of the Santa Monica Mountains, marks the boundary between the valley and the communities of Hollywood and the Los Angeles Westside. The San Fernando Valley has connections to other regions: the Santa Clarita Valley via Newhall Pass, the Westside via Sepulveda Pass, Hollywood via Cahuenga Pass, Simi Valley via Santa Susana Pass, and the Crescenta Valley via Interstate 210.



San Fernando vs Livermore valleys water comparison map by William Mulholland, 1912

Habitat

The valley's natural habitat is a "temperate grasslands, savannas, and shrublands biome" of grassland, oak savanna, and chaparral shrub types of plant community habitats, along with lush riparian plants along the river, creeks, and springs. In this Mediterranean climate, post-1790s European agriculture for the mission's support consisted of grapes, figs, olives, and general garden crops.<sup>[6]</sup>

Climate

The San Fernando Valley has a subtropical/hot-summer Mediterranean climate, with long, hot, dry summers, and short, mild winters, with chilly nights and sporadic rainfall. Due to its relatively inland location and other factors, summer days are typically hotter and winter nights typically colder than in the Los Angeles basin. More recently, statewide droughts in California have further strained the San Fernando Valley's and Los Angeles County's water security.<sup>[7]</sup>

Climate data for Burbank, California (at Burbank Valley Pump)													
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Record high °F (°C)	92 (33)	92 (33)	98 (37)	105 (41)	107 (42)	111 (44)	114 (46)	111 (44)	114 (46)	108 (42)	102 (39)	95 (35)	114 (46)
Mean daily maximum °F (°C)	67.5 (19.7)	68.7 (20.4)	70.4 (21.3)	73.7 (23.2)	76.6 (24.8)	81.4 (27.4)	88.3 (31.3)	89.0 (31.7)	87.2 (30.7)	80.9 (27.2)	73.7 (23.2)	67.9 (19.9)	77.1 (25.1)
Mean daily minimum °F (°C)	41.7 (5.4)	43.5 (6.4)	45.7 (7.6)	48.9 (9.4)	53.5 (11.9)	57.3 (14.1)	61.2 (16.2)	61.4 (16.3)	59.2 (15.1)	53.3 (11.8)	46.0 (7.8)	41.6 (5.3)	51.1 (10.6)
Record low °F (°C)	22 (−6)	27 (−3)	23 (−5)	32 (0)	39 (4)	43 (6)	45 (7)	46 (8)	43 (6)	33 (1)	29 (−2)	22 (−6)	22 (−6)
Average precipitation inches (mm)	3.35 (85)	3.84 (98)	2.84 (72)	1.17 (30)	0.27 (6.9)	0.07 (1.8)	0.01 (0.25)	0.10 (2.5)	0.20 (5.1)	0.60 (15)	1.51 (38)	2.34 (59)	16.29 (414)
Source: <sup>[8]</sup>													



## EXHIBIT C

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<https://www.wsj.com/articles/living-in-the-valley-is-like-cool-now-1522332000>

REAL ESTATE | HOMES

# Living in 'the Valley' Is, Like, Cool Now

Long the suburban stepsister of luxury Los Angeles neighborhoods, the San Fernando Valley is becoming more fashionable—and more competitive

By [Katy McLaughlin](#) [Follow](#)

March 29, 2018 10:00 am ET



After years living in Hollywood Hills in Los Angeles, Calif., Carol and Arnie Kleiner decamped for the San Fernando Valley. A view of their home's kitchen. PHOTO: JOE SCHMELZER FOR THE WALL STREET JOURNAL

**In April**, Roger Ewing, owner of three Sotheby's International Realty offices in Los Angeles's San Fernando Valley, took meetings with six of his top-producing agents, only to learn they were all quitting to join a competitor.

"They put me out of business," said Mr. Ewing. Ultimately, 15 agents left, stripping the company of its top 25% of producers, which "took all the profit out of the company and put me in the red," said Mr. Ewing. Having closed two of his offices in July and the third last month. Mr. Ewing is now working as an independent real-estate broker.

Turf wars in the competitive Los Angeles real-estate market are nothing new, but this one broke out in an unexpected place: the San Fernando Valley. Long considered the suburban stepsister of neighborhoods like Beverly Hills, Bel-Air and Malibu, the





The Kleiners purchased the home for just under \$2.6 million. The area has become more sophisticated and walkable, Ms. Kleiner said. The couple with their dog.

PHOTO: JOE SCHMELZER FOR THE WALL STREET JOURNAL

Valley has become more fashionable, more expensive, and—as Mr. Ewing discovered—more competitive.

The battles reflect the growing strength of the market. Last year, there were 1,765 property sales in the Valley for over \$5 million, up 54% from a decade ago, according to Zillow, a real estate website. It also found the median price for a single-family home in the Valley hit \$673,000 last year, above its precrash peak of \$627,000, in 2007.

Compass, the self-described real estate technology company to which Mr. Ewing's agents moved, recently opened two offices in the Valley with 40 agents between them. Many of the company's additional 420 Los Angeles-based agents also do deals in the Valley, said Chief Executive Robert Reffkin. In late 2017, New York-based Compass received a \$450 million infusion from [SoftBank Vision Fund](#), a Japan-based technology investor.

Pacific Union International, a San Francisco, Calif.-based company, acquired three Los Angeles brokerages within the past two years, giving it an entree into the market and branches in three Valley neighborhoods. The company plans to open two offices in the Valley—one in Burbank this year, and possibly another in Hidden Hills or Calabasas—said Nick Segal, president of Pacific Union International, Southern California.



A living area in the Kleiners' home. Long known for cookie-cutter suburbs and chain restaurants, the San Fernando Valley now offers an improving restaurant and shopping scene and a growing quantity of high-end construction. PHOTO: JOE SCHMELZER FOR THE WALL STREET JOURNAL

Brokerages known for concentrating on luxury markets are also making incursions. Last year, Hilton & Hyland, based in Beverly Hills, transacted \$156 million worth of sales in the Valley. Five years ago, it hardly did any business in the area, said estates director Donovan Healey, who specializes in the Valley and moved to Hilton & Hyland from another brokerage in September.

The Agency, a luxury brokerage based in Beverly Hills, opened offices in Sherman Oaks and Calabasas within the past 14 months. Chief Executive Mauricio Umansky is closely associated with Beverly Hills; after all, his wife stars in the reality-television show "Real Housewives of Beverly Hills." But last year, the couple bought and moved to an \$8.5 million house in Encino, in the Valley.

The majority of the San Fernando Valley lies within the city of Los Angeles, but locals nonetheless tend to refer to it as "the Valley" and to the rest of Los Angeles as "the city." It is physically separated from the Los Angeles basin to the South by the Santa Monica Mountains, traversable by freeway or canyon roads.



Jonathan Mangum, an actor and comedian who works as the announcer on the CBS television show 'Let's Make a Deal,' recently paid \$2.1 million for this Toluca Lake house. PHOTO: MICHELLE DREWES FOR THE WALL STREET JOURNAL

In the 1980s, pop culture took aim at the Valley's tract housing and suburban culture in songs such as Frank and Moon Zappa's "Valley Girl," which featured vapid lyrics spoken in an exaggerated Southern Californian accent. The 1983 film "Valley Girl"



The changing attitudes toward the Valley reflect the changing economics of Los Angeles real estate. Some of the Hollywood types who pioneered neighborhoods like Beverly Hills and Bel-Air can no longer afford these areas, having been priced out by technology executives, foreign buyers and cash investors.

And while the West Side, an area that includes Venice, Santa Monica, Pacific Palisades and Brentwood, long offered a cheaper alternative, prices there have risen over 59% since 2012, according to an analysis by Tami Pardee, founder of Halton Pardee & Partners, a brokerage with three offices on the West Side.



Mr. Mangum sees Toluca Lake as ‘the place to go if you’re an actor doing well and don’t want to live in Pacific Palisades, Brentwood or Santa Monica,’ because they can’t offer as much for the money. He is pictured here with wife Leah, a casting director, and sons Austin, left, and Chase. PHOTO: MICHELLE DREWES FOR THE WALL STREET JOURNAL

It has gotten to the point that star-struck fans are starting to pop up in more fashionable Valley neighborhoods. “Young kids come out here with their Instagram shots with the sign ‘Hidden Hills,’” said Jeff Biebuyck, an agent with Compass who was one of the defectors from Sotheby’s. They know the high-end gated community from reality TV shows featuring members of the Kardashian family, from raps by resident Drake and from television personality Kylie Jenner’s clothing line, which features items appliquéd with the words “Hidden Hills.”

“I’m getting more executives from the studios, more actors and musicians,” said Craig Strong, director of estates division for Pacific Union International. He recently sold a \$2.1 million Toluca Lake house to Jonathan Mangum, an actor and comedian who works as the announcer on the CBS television show “Let’s Make a Deal.” His wife,

Leah, is a casting director and their 14-year-old son Chase is an actor on the Fox television show “Lethal Weapon.”

Mr. Mangum sees Toluca Lake as “the place to go if you’re an actor doing well and don’t want to live in Pacific Palisades, Brentwood or Santa Monica,” because they can’t offer as much for the money. His nearly 3,000-square-foot house is in a quiet neighborhood that reminds Mr. Mangum of his hometown of Mobile, Alabama.

At the same time the Valley—long known for cookie-cutter suburbs and chain restaurants—offers good schools, an improving restaurant and shopping scene and a growing quantity of high-end construction. Many areas have urbanized, with more walkable streets, independent boutiques and eateries.



Mr. Mangum said his nearly 3,000-square-foot house is in a quiet neighborhood that reminds him of his hometown of Mobile, Alabama. PHOTO: MICHELLE DREWES FOR THE WALL STREET JOURNAL

After years living in the posh “city” neighborhood of Hollywood Hills, Carol and Arnie Kleiner decamped for Studio City in the Valley, moving into a house they purchased for just under \$2.6 million. Not only had the area become more sophisticated and walkable, it offered a less trafficked alternative to Hollywood, Ms. Kleiner, 74, said. Mr. Kleiner, 74, who worked as the president of ABC Channel 7 before retiring, added that the sushi is excellent.

Tomer Fridman, another former Sotheby’s agent now at Compass, said he would list a new construction home in Hidden Hills for between \$30 million and \$35 million in June. As expensive as the Hidden Hills and Calabasas markets are, prices rarely top \$1,500-per-square-foot, while comparable homes in Bel-Air might fetch \$3,000-per-square foot, Mr. Fridman said.

## Further Reading

### Millennium Tower Stopped Sinking, but Apartment Values Did Not





**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 18th day of June, 2025, a copy of the foregoing document was electronically delivered to:

KURTZ, PETERS & ASSOCIATES LLC  
Benjamin M. Kurtz, Esquire  
350 Camino Gardens Blvd., Suite 300  
Boca Raton, Florida 33432  
Ph: 301-685-3911 Fx: 301-685-3674  
bkurtz@kurtzandpeters.com

By: /s/ Paulo A. de Almeida  
Paulo A. de Almeida